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10 **UNITED STATES BANKRUPTCY COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13 **In re:**

14 **PG&E CORPORATION,**

15 **- and -**

16 **PACIFIC GAS AND ELECTRIC**  
17 **COMPANY,**

18 **Debtors.**

19  Affects PG&E Corporation  
20  Affects Pacific Gas and Electric Company  
21  Affects both Debtors

22 \* *All papers shall be filed in the Lead Case,*  
23 *No. 19-30088 (DM).*

24 Bankruptcy Case  
No. 19-30088 (DM)

25 Chapter 11

Related Dkt. No. 1535

Date: May 9, 2019

Time: 9:30 a.m.

Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

Judge: Hon. Dennis Montali

**STATEMENT OF OPPOSITION TO  
MOTION BY THE CITY AND COUNTY  
OF SAN FRANCISCO FOR  
DETERMINATION THAT AUTOMATIC  
STAY DOES NOT APPLY UNDER  
§ 362(b)(4) OR IN THE ALTERNATIVE,  
FOR RELIEF FROM THE AUTOMATIC  
STAY UNDER § 362(d)(1)**

1 Pursuant to the Court's text order on April 29, 2019 (the "**April 29 Order**"), Pacific Gas and  
2 Electric Company (the "**Utility**"), as debtor and debtor in possession in the above-captioned chapter  
3 11 cases, respectfully submits this statement in opposition to the City and County of San Francisco's  
4 ("CCSF") Motion [Dkt No. 1535]. The Utility recognizes that it is subject to a wide range of  
5 regulatory obligations and is no way attempting to shirk those responsibilities while in Chapter 11.  
6 However, the proceeding initiated by CCSF at the Federal Energy Regulatory Commission ("**FERC**")  
7 that underlies the Motion is clearly subject to the automatic stay as a prepetition action commenced  
8 by CCSF against the Utility. CCSF's prosecution of this proceeding at FERC, in furtherance of  
9 CCSF's pecuniary interests, is not exempted from the automatic stay under section 362(b)(4) of the  
10 Bankruptcy Code, and this Court should not lift the stay. The Utility opposes the Motion, and will  
11 submit a preliminary opposition prior to the May 9, 2019 preliminary hearing, pursuant to the Court's  
12 April 29 Order.

13  
14 Dated: May 2, 2019

WEIL, GOTSHAL & MANGES LLP  
KELLER & BENVENUTTI LLP

17 By: /s/ Peter J. Benvenutti  
Peter J. Benvenutti

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19 *Attorneys for the Debtors and Debtors in  
Possession*